

July 16, 2018  
*Via Electronic mail*

Alicia Barton  
President/CEO  
NSERDA  
17 Columbia Circle  
Albany, NY 12203

John Rhodes,  
Chair, NY Public Service Commission  
Empire State Plaza, Agency Building 3, 20<sup>th</sup> Floor  
Albany, NY  
12223

Re: *New Efficiency: New York White Paper* and  
Case 18-M-0084—In the Matter of a Comprehensive Energy Efficiency Initiative

Dear Ms. Barton and Chairman Rhodes,

The Association for Energy Affordability, Inc. (AEA) is a provider under numerous NYSERDA programs, a member of several NYSERDA advisory groups and an active party in Case 18-M-0084. We respectfully submit this letter on Governor Cuomo’s new energy efficiency initiative and the joint NYSERDA/DPS *New Efficiency: New York White Paper* (“White Paper”). AEA is a non-profit providing energy efficiency products and services in affordable multifamily buildings, both those undergoing improvements and new construction. We also have extensive experience as a program implementer and subcontractor with utility programs for electric and natural gas efficiency.

AEA helped prepare, and is a signatory to, several documents submitted today in response to the request for comments on the White Paper. We support the content of the four separate comments filed on behalf of *Energy Efficiency for All New York (EEFA NY)*, the *Residential Building Efficiency Industry*, the *Environmental Parties Coalition*, and the *Alliance for Clean Energy New York/Advanced Energy Economy Institute*. In this brief letter, we simply highlight our key concerns (which are also reflected in the lengthier submissions mentioned here).

At the outset, we would like to note there is general agreement among the parties involved in the above-mentioned comment submissions on several overarching priority areas in need of accelerated decision-making and implementation in order to achieve New York’s

laudable carbon reduction, environmental, economic development and equity and affordability goals. These clear priorities include:

- The need for clear near-term decisions on interim targets and a glide path for the needed ramp up for the utilities; already in progress REV initiatives under ETIPs and pilots, and even existing EAMs, are insufficient.
- A clear funding mechanism for the necessary ramp up in effort, including cost recovery provisions and incentive structures (within the EAMs framework or otherwise) for utility procurement of energy efficiency.
- Additional guidance or a directive on the value of energy efficiency that utilities will use to capture value associated with peak energy usage and demand reductions, avoided T&D, and avoided carbon emissions.
- The importance of addressing delivered/unregulated fuels, including buildings with dual fuel systems, and encouraging beneficial electrification.

AEA also strongly supports the more specific recommendations on program design and implementation (expanded on) in the lengthier comments, including:

- Enable strong financing programs for energy efficiency in affordable multifamily buildings aligned with housing finance programs and attentive to the special needs of this sector.
- Increase the funding dedicated to low income housing in various building types with the amount of funding representative of the proportion of the population that is low income and the building types in which they reside.
- Follow-through on recommendations from the Clean Energy Advisory Council Low Income Working Group, and, specifically, design programs for multifamily buildings to enable a whole-building approach through portfolio and/or phased approaches.
- Support a quick ramp up of utility procurement of energy efficiency, with appropriate cost recovery and incentives, to regain lost ground and create the momentum and market transformation essential to achievement of the state's goals.
- Accompany driving demand with strong workforce development policies that adopt industry-recognized training and certification standards, prioritize disadvantaged and local workers, and include on-the-job training opportunities.

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- Ensure transparency in tracking and reporting and encourage the use of open protocols/source code for measurement.
- Facilitate coordination and not competition between NYSERDA and the utilities; we suggest an advisory council drawing from lessons learned from NY's SBC Advisory Group and experiences in other states, such as Massachusetts.

We thank you for the hard work of the staff of NYSERDA and the Department of Public Service in preparing the White Paper and presenting the contents to interested parties at the recent technical conferences. We look forward to working with them and other stakeholders to implement an effective and nation-leading energy efficiency initiative.

Respectfully submitted,



David Hepinstall  
Executive Director



Valerie Strauss  
Director of Policy & Regulatory Affairs